

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

SHANNON PEREZ, *et al.*,

*Plaintiffs,*

v.

STATE OF TEXAS, *et al.*,

*Defendants.*

CIVIL ACTION NO.  
SA-11-CA-360-OLG-JES-XR  
[Lead Case]

**QUESADA PLAINTIFFS' DESIGNATION OF EXPERT WITNESS**

Plaintiffs MARGARITA V. QUESADA, ROMEO MUNOZ, MARC VEASEY, JANE HAMILTON, LYMAN KING, JOHN JENKINS, KATHLEEN MARIA SHAW, DEBBIE ALLEN, JAMAAL R. SMITH, and SANRA PUENTE, hereby designate Dr. Allan J. Lichtman as their expert witness.<sup>1</sup> Pursuant to this Court's Scheduling Order and Federal Rule of Civil Procedure 26(a)(2)(B), plaintiffs are serving on Defendants' counsel today Mr. Lichtman's report and other information prescribed by Rule 26(a)(2)(B).

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<sup>1</sup> In light of the Court's directive that the parties share expert and fact witnesses, see ECF No. 1389 at 3 n.4, the Quesada plaintiffs intend to rely upon the Rodriguez plaintiffs' expert Dr. Stephen Ansolabehere for testimony regarding their Section 2 results claims.

Dated: May 26, 2017

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 26<sup>th</sup> day of May, 2017, I served a copy of the foregoing on counsel who are registered to receive NEFs through the CM/ECF system. All attorneys who have not yet registered to receive NEFs have been served via first-class mail, postage prepaid.

/s/ J. Gerald Hebert  
J. GERALD HEBERT